Case 1:16-cv-01143-GHW Document 141 Filed 01/11/21 Page 1 of 2

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JAMES E. JOHNSON Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

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January 8, 2021

## **VIA ECF**

Honorable Gregory H. Woods United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

## MEMORANDUM ENDORSED

Re: Roy Taylor v. NYPD Officer Trigeno, et al., 16-CV-1143 (GHW)

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York and Nayab Qayyum<sup>1</sup> in the above-referenced matter. I write respectfully to request a 7-day extension of time, nunc pro tunc, from January 6, 2021 to the date of the initial conference, to file the joint case management plan and proposed scheduling order as required by Your Honor's Individual Rule 2(b). This request is being submitted without plaintiff's consent.<sup>2</sup>

To date, the undersigned has been unable to meet and confer with plaintiff in anticipation of the initial pretrial conference. Unfortunately, previous efforts to communicate with plaintiff have been unsuccessful due to a myriad of issues, including facility staffing and safety concerns. At this time, the facility is attempting to arrange another call with plaintiff before the scheduled conference date. The undersigned hopes to communicate with plaintiff soon to prepare a joint proposed case management plan and scheduling order. However, the undersigned is unable to do so before the date of the initial conference.

<sup>&</sup>lt;sup>1</sup> The Civil Docket Sheet incorrectly spells defendant's last name as Quayyum. The correct spelling is Qayyum.

<sup>&</sup>lt;sup>2</sup> The undersigned was unable to speak with plaintiff or obtain consent before the filing of this extension request.

In light of the foregoing, the undersigned seeks a 7-day extension of time from January 6, 2021 until January 13, 2021 to meet and confer with plaintiff and file a joint proposed case management plan and scheduling order.

The undersigned thanks the Court for its consideration of this request.

Respectfully submitted,

/s/ Amanda Rolon
Assistant Corporation Counsel
Special Federal Litigation Division

United States District Judge

## **BY FIRST CLASS MAIL**

Roy Taylor Plaintiff *Pro Se* NYSID: 04528137Q B&C No. 3291804923 Anna M Kross Center 18-18 Hazen Street East Elmhurst, NY 11370

Application granted. The deadline for the parties to submit their joint proposed case management plan and scheduling order is extended to January 13, 2021 at 10:00 a.m.

The Clerk of Court is directed to mail a copy of this order to Plaintiff. SO ORDERED.

Dated: January 10, 2021

2